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Docket No.: 324212003700

REMARKS

Claims 1-59 were pending. Claims 1-59 were rejected. By virtue of this response, claims 1, 21, and 31 are amended. Accordingly, claims 1-59 are currently under consideration. Amendment of subject matter is not to be construed as an abandonment of any subject matter. No new matter was added by virtue of these amendments.

Claim Rejection Under 35 USC §103(a)

Claims 1-59 are rejected under 35 U.S.C. 103(a) as being unpatentable over Zamir et al (US 2005/0240580) ("Zamir") in view of Pollack et al (U.S. 6,578,025) ("Pollack").

In response, claim 1 has been amended to recite, among other things, "providing a plurality of candidate search terms related to said first search term, wherein said candidate search terms are generated in accordance with relevancy scores, said candidate search terms comprise potential alternative search terms, and said relevancy scores are based on behavior of a plurality of users, and at least one user of said plurality of users does not have a user profile." (Emphasis added).

In contrast, the Examiner states that "Zamir did not specifically detail the claimed feature of 'said relevancy scores are based on behavior of a plurality of users,'" as recited in claims 1, 21, and 31. Moreover, Zamir discloses that its relevancy determination is based on an individual's user preference according to the personal user profile of the specific user requesting a search. Zamir discloses that "a set of placed content that matches the interest of the user is identified, and the set of placed content is ordered in accordance with the user profile" (Emphasis added) (Zamir, paragraph [0010]):

A user profile comprises multiple items that characterize a user's interests or preferences. These items are extracted from various information sources, including previous search queries submitted by the user, links from or to the documents identified by the previous queries, sampled content from the identified documents as well as personal information implicitly or explicitly provided by the user. (Zamir, paragraph [0011]) (emphasis added)

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Pollack discloses determining "the relevancy of the incoming message to a plurality of users and forward the incoming message to only those users to whom the message is particularly relevant" by using "user profiles." Each of the plurality of users has a user profile, and these user profiles are used to determine relevancy. See col. 3, lines 3-7; col. 3, lines 38-54.

Therefore, Zamir and Pollack, either alone or in combination, at least do not teach or suggest that "relevancy scores are based on behavior of a plurality of users, and at least one user of said plurality of users does not have a user profile" as recited in claims 1, 21, and 31. Therefore, the addition of Pollack does not cure the deficiencies of Zamir as applied to claims 1, 21, and 31.

Even if Pollack teaches or suggests "relevancy scores based on behavior of a plurality of user, and at least one user of said plurality of users does not have a user profile," Zamir teaches away from using the "behavior of a plurality of users, and at least one user of said plurality of users does not have a user profile" to provide candidate search terms:

However, if the user's preference is significantly biased by some personal factors that are not clearly reflected in a search query itself, or if the user's preference is quite different from the random user's preference, the search results from the same search engine may be less useful to the user, if not useless.
(Zamir, paragraph [0007])

Zamir as a whole thus discourages using the "behavior of a plurality of users, and at least one user of said plurality of users does not have a user profile" to determine relevancy scores in order to provide the candidate search terms, as recited in claims 1, 21 and 31.

Therefore, Applicant further submits that the disclosures of Zamir and Pollack, taken in their entirety, in fact do not provide one skilled in the art with a teaching, suggestion, or motivation to modify the references to meet the features of claims 1, 21, and 31, or suggest the desirability of the features of the present claims. Accordingly, Applicant respectfully submits that claims 1, 21, and 31 are allowable over Zamir and Pollack.

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For at least the foregoing, claims 2-20, 22-30, and 32-59, which are dependent from claims 1, 21 and 31, are in condition for allowance. Accordingly, the Applicant respectfully requests that the rejections to claims 1-59 under 35 U.S.C. § 103(a) be withdrawn. Reconsideration and allowance are respectfully requested for claims 1-59.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 324212003700. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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